

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

THE RESEARCH FOUNDATION FOR
THE STATE UNIVERSITY OF NEW
YORK, UNIVERSITY OF
CONNECTICUT, and WORCESTER
POLYTECHNIC INSTITUTE,

Plaintiffs,

v.

SAMSUNG ELECTRONICS CO., LTD.;
SAMSUNG ELECTRONICS AMERICA,
INC.; SAMSUNG SEMICONDUCTOR,
INC.,

Defendants.

C.A. No. 2:23-cv-00141-RWS-RSP

JURY TRIAL DEMANDED

JOINT MOTION TO STAY AND NOTICE OF SETTLEMENT

Plaintiffs The Research Foundation for The State University of New York, University of Connecticut, and Worcester Polytechnic Institute (“Plaintiffs”) and Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc. and Samsung Semiconductor, Inc. (“Samsung”) (collectively with Plaintiffs, “the Parties”) have reached a settlement in principle to resolve all issues in the case and are presently engaged in finalizing the long-form documents related to that agreement. Accordingly, the Parties ask that the Court stay all pending deadlines between the Parties for thirty (30) days up to and including **May 19, 2025**, in order to allow them sufficient time to finalize the long-form settlement in this matter and file dismissal papers without incurring additional expenses.

Dated: April 17, 2025

Respectfully submitted,

/s/Michael Siem by permission Claire Henry

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CERTIFICATE OF CONFERENCE

I hereby certify that counsel for parties have conferred to discuss the substantive relief sought in this Motion pursuant to Local Rule CV-7(i) and that this motion is being filed jointly.

/s/Claire Abernathy Henry
Claire Abernathy Henry

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 17, 2025, counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/Claire Abernathy Henry
Claire Abernathy Henry